



Malmesbury & St Paul Without Residents' Association

Hon President : The Mayor of Malmesbury

17 Culver Gardens
Malmesbury
Wiltshire
SN16 9BY



Alex Smith
Development Services North
Monkton Park
Chippenham
Wilts, SN15 1ER

15th September 2016

Land at Filands South – 16/07288/OUT

Dear Alex,

The Malmesbury & St Paul Without Residents' Association at its committee meeting last evening unanimously agreed to submit its very strong opposition to this opportunistic and unnecessary planning application. Numerous members had contacted committee representatives to express their outrage at the disrespect that Gleeson and their planning agents continue to exhibit toward the community in Malmesbury and the democratic process as a whole by the submission of this application.

It is our belief that the general thrust of the policies underpinning the National Planning Policy Framework (NPPF) was to give prominence to neighbourhood plans to allow local communities to shape and direct sustainable development in their neighbourhood area. As other organisations have commented the application site was not one of the three sites recommended for development in the MNP that was subsequently endorsed by 90% of the 32% turnout of voters in the three sponsoring parishes. If this application is approved it will be seen as driving a coach and horses through the democratic process and a betrayal of these principles.

The applicant's interpretation of the results of their pre-application public consultation is particularly bizarre because it seeks to claim that the lack of comments from close neighbours is somehow an endorsement of their proposals. It deviously omits to acknowledge that there are few neighbouring properties to the site and ignores the fact that the 200+ adverse comments from throughout the community area are a clear indication of the offence taken by a wide cross-section of local people to this unwelcome approach.

The applicant claims that the town requires these additional 71 dwellings to satisfy demand, but this is a particularly myopic view of the approved development plans for the

Malmesbury urban area. The team that prepared the MNP very prudently planned for a 15% contingency over and above the minimum target of 885 houses identified in the Wiltshire Core Strategy (WCS). As of April 2015, the latest figures available, house completions in the Malmesbury urban area stand at 492 with another 521 either under construction (Bloor Homes, Cowbridge & Burnham House sites), subject to a current planning application (Backbridge Farm) or well-advanced in pre-application preparation (development around the PCC – sites 6/10/11). It is therefore abundantly evident that the MNP's housing delivery plans, including its contingency, are sound and hence this application is surplus to local requirements and therefore should be refused.

The committee also concluded that the benefits described in the proposal are either grossly overstated or simply untrue. On the contrary, the Association argues that the harm that will be inflicted upon the community will significantly outweigh the paucity of benefit claimed by the applicant. The committee is particularly concerned that our infrastructure and services will be put under intolerable pressure that will not be alleviated by the applicant's proposal of S106 funding. As a consequence of the delivery of the MNP's housing numbers during the first and middle parts of the planning period considerable demands on its infrastructure and services will already have to be accommodated and managed. An additional unplanned 71 houses will push this task beyond the tipping point.

One of the biggest concerns is the impact these additional houses will have on the carefully planned primary school capacity calculations in the MNP. Perhaps a little idealistically, the MNP states that new development should be phased to synchronise with the potential expansion of Malmesbury CE Primary School so that the planned additional demand for primary school places can be met. Simply making a hitherto unquantified S106 contribution to education will not directly add to the additional primary school capacity required for this proposal to satisfy the likely impact.

To conclude, the very worrying issues raised above cause the Association to strongly oppose this application. The community have already democratically voiced their views on the contents of the MNP and it is now part of Wiltshire planning policy. The public, not only locally but throughout the country, must have confidence that they will continue to be allowed to determine the final shape and to direct their community structure going forward. Our MNP does exactly that and whilst doubtless some developers are still in denial about the concept of localism, and it appears that Gleeson are one of them, the old discredited 'top down' approach to community planning must not be allowed to infect by default the present very worthy Government policy. A refusal is the only sensible decision.

Yours sincerely,

Roger Budgen

Chairman